

## REMARKS

This is in response to the Office Action mailed February 28, 2005.

In the Office Action, Applicant's Claims 1-18, 20 and 21 were allowed.

Applicant gratefully acknowledges the allowance of these claims.

In the Office Action mailed February 28, 2005, Applicant's Claim 19 was rejected as obvious over the combination of Wakisaka (U.S. Pat. No. 6,112,174) and Zavoli (U.S. Pat. No. 6,598,016). The Office Action mailed February 28, 2005 followed Applicant's Appeal Brief of August 23, 2004 in which Applicant explained why Claim 19 was not obvious over the combination of Wakisaka and Ashby (U.S. Pat. No. 5,974,419). In the Office Action mailed February 28, 2005, the Examiner acknowledged that Applicant's Claim 19 was not obvious over the combination of Wakisaka and Ashby, but made the new rejection that Claim 19 was obvious over Wakisaka and Zavoli. Applicant respectfully traverses this new rejection. At least for the reasons explained below, Applicant's Claim 19 is not obvious over the combination of Wakisaka and Zavoli.

### Applicant's Claim 19

Applicant's Claim 19 relates to a system that provides geographic information and includes *inter alia* an "automatic speech recognition system." The "automatic speech recognition system" of Applicant's Claim 19 uses a "word list" that contains "data representations of spoken names of geographic features." In order to facilitate recognition of names of geographic features, the number of words in the "word list" is limited to "only a portion of all available data representations of spoken names of geographic features." Specifically, the "word list" contains two parts. A "first part" "changes to include different words as the vehicle travels in the region" and includes "words" for "names of geographic features in proximity to the current location of the vehicle." A "second part" of the "word list" "does not change . . . as the vehicle travels" and includes "words for names of selected geographic features located throughout the region." Applicant's Claim 19 further recites that both the "first part" and the "second part" are available to the "automatic speech recognition system" "at the same time" so that the words in either "list" can be recognized. This allows for

recognition of names for geographic features located in proximity to the vehicle as well as recognition of names for selected geographic features (such as popular destinations) not located in proximity to the vehicle.

### Wakisaka

Wakisaka relates to a car navigation system that includes a speech recognition system. The speech recognition system disclosed by Wakisaka uses a plurality of separate data dictionaries containing words for place names for speech recognition purposes. Each dictionary contains the names of places located in corresponding separate geographic areas. As the vehicle travels, the Wakisaka speech recognition system selects the appropriate dictionary to use for speech recognition purposes based on the location of the vehicle. Wakisaka discloses using only one dictionary at a time, i.e., by selecting only one dictionary to be stored in a second storage section based on the location of the vehicle. (*See*, Wakisaka: column 2, lines 50-53.) Since each dictionary in Wakisaka corresponds to a separate geographic area and since Wakisaka uses only one dictionary at a time, the words and sentences available for speech recognition are limited to those in the geographic area around the vehicle. Therefore, Wakisaka does not disclose the limitation recited in Applicant's Claim 19 of a "*second part*" of a "*word list*", wherein the "*second part*" "*does not change . . . as the vehicle travels*" and wherein the "*second part*" contains "*data representations of spoken names of selected geographic features*" that are "*located throughout the region.*"

### Zavoli

Zavoli relates to a speech recognition system for specifying geographic locations to a computer system (Zavoli: column 2, lines 35-38). According to Zavoli, two separate speech recognition dictionaries are provided (Zavoli: column 5, lines 49-53). Zavoli states that a first dictionary, VR1, includes numbers and simple commands and a second dictionary, VR2, includes street names (Zavoli: column 5, lines 23-29). Zavoli states that the advantage of using separate dictionaries is that the dictionary used for only

commands and numbers can be made smaller thereby increasing the reliability and speed of recognizing this type of speech input (Zavoli: column 5, line 65-column 6, line 8).

*Applicant's Claim 19 is not obvious over Wakisaka and Zavoli.*

Applicant's Claim 19 is not obvious over Wakisaka and Zavoli because all the elements of Claim 19 are not disclosed by the combination of these references. Specifically, even if Wakisaka and Zavoli were combined, the resultant combination would still fail to disclose a *"second part"* of a *"word list"* that *"does not change . . . as the vehicle travels"* and that includes *"words for names of selected geographic features located throughout the region"*, as recited in Applicant's Claim 19.

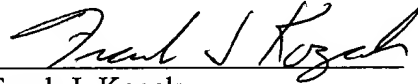
As previously pointed out, Wakisaka discloses a plurality of speech-recognition dictionaries, each of which contains a separate collection of words for the names of geographic places located in a corresponding one of a separate plurality of distinct geographic areas into which a region is divided. However, Wakisaka discloses using only one speech-recognition dictionary at a time and changing from one dictionary to another as the vehicle moves from one of the corresponding geographic areas to another. Zavoli discloses using two dictionaries in a speech recognition system. However, Zavoli teaches that only one of these two dictionaries is used for names for geographic features (i.e., street names) to allow the other dictionary to be used only for commands and numbers thereby improving speed and reliability. If Wakisaka and Zavoli were combined, the result would be a navigation system with a speech recognition system that used two dictionaries, where one of the dictionaries would contain the names of geographic features that changed as the system was moved like the system described by Wakisaka and the other dictionary would not include names of geographic features, but instead would include commands and numbers like the system described by Zavoli. There is no teaching that would motivate one of ordinary skill in the art to modify a single dictionary for geographic feature names, as disclosed by either Wakisaka or Zavoli, to have two *"parts"*, as recited in Applicant's Claim 19, where a *"first part"* *"changes to include different words as the vehicle travels in the region"* and includes *"words"* for *"names of geographic features in proximity to the current location of the*

Ser. No. 09/784,660  
Response dated May 11, 2005  
Reply to Office Action of February 28, 2005

*vehicle” and a “second part” of the “word list” “does not change . . . as the vehicle travels” and includes “words for names of selected geographic features located throughout the region.”* At least for these reasons, Applicant’s Claim 19 is not obvious over the combination of Wakisaka and Zavoli. Applicant requests that the rejection of Claim 19 be withdrawn and the application allowed.

If any issues remain, the Examiner is invited to call the undersigned at the telephone number below.

Respectfully submitted,



Frank J. Kozak  
Reg. No. 32,908  
Chief Intellectual Property Counsel

NAVTEQ Corporation  
(formerly NAVIGATION TECHNOLOGIES CORPORATION)  
222 Merchandise Mart Plaza, Suite 900  
Chicago, IL 60654  
(312) 894-7000 x7371